

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

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**IN RE 2014 RADIOSHACK ERISA  
LITIGATION**

**MASTER FILE NO. 4:14-cv-00959-O**

**THIS DOCUMENT RELATES TO:**

**ALL ACTIONS**

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**DECLARATION OF MICHEL J. KLEIN IN SUPPORT OF UNOPPOSED MOTION TO  
RECONSIDER AND RESCIND THE COURT’S ORDER OF SEPTEMBER 8, 2015**

I, Michael J. Klein, respectfully submit this Declaration in support of the Unopposed Motion to Lift the Court’s Order of September 8, 2015. I have personal knowledge of the matters set forth herein.

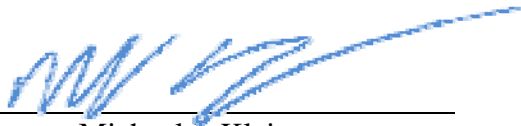
**Pursuant to 28 U.S.C. § 1746, I declare as follows:**

1. I am an attorney at Stull, Stull & Brody (“SSB”), counsel for Plaintiff William A. Gerhart and a Court-appointed Interim Lead Class Counsel Committee Member.
2. After filing *Gerhart v. RadioShack Corp. et al*, Docket No. 3:14-cv-04419 (the “*Gerhart* Action”), I sent a letter to receive a certificate of good standing from the State of Connecticut, one of the jurisdictions in which I am admitted to practice law. Within days of my receiving the certificate, William Federman, Esq., moved for my admission *pro hac vice* in the *Gerhart* Action.
3. It generally takes two to four weeks to get a certificate of good standing from the State of Connecticut. [http://www.jud.ct.gov/sgc/faq\\_certgoodstand.htm](http://www.jud.ct.gov/sgc/faq_certgoodstand.htm). I will not be able to get a certificate of good standing within a week. If the Court does not grant this motion by

September 14, 2015, I will send to the State of Connecticut for another certificate of good standing, and will move for admission for *pro hac vice* promptly after receiving the same.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 9, 2015

  
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Michael J. Klein

**CERTIFICATE OF SERVICE**

I hereby certify that on September 9, 2015, I electronically filed the foregoing with the clerk of Court using the CM/ECF system, which will send a notification to all counsel of record in this Action.

/s/ Roger L. Mandel  
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Roger L. Mandel